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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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**SECURITIES AND EXCHANGE COMMISSION,** :  
:  
**Plaintiff,** :  
:  
**-against-** :  
:  
:  
:  
**CLEAN CARE TECHNOLOGIES, INC.,** : **08 Civ. 1719 (HB)**  
**EDWARD KLEIN, AL NAZON and** : **ECF CASE**  
**ANIL VARUGHESE,** :  
:  
**Defendants,** :  
:  
**and** :  
:  
**CLEAN CARE SYSTEMS, LLC,** :  
:  
**Relief Defendant.** :  
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X

**NOTICE OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**  
**AS TO DEFENDANTS EDWARD KLEIN, AL NAZON AND ANIL VARUGHESE**

**PLEASE TAKE NOTICE** that upon the basis of the accompanying Motion for Summary Judgment As To Defendants Edward Klein, Al Nazon and Anil Varughese; the concurrently-filed Declaration of Michael D. Birnbaum, and the exhibits thereto; Plaintiff's Rule 56.1 Statement of Undisputed Facts; and all prior proceedings in this action, plaintiff Securities and Exchange Commission (the "Commission") will move this

Court before Honorable Harold Baer, Jr., at the United States Courthouse, 500 Pearl Street, New York New York 10007, for summary judgment against Edward Klein, Al Nazon and Anil Varughese, ("the Defendants") as the record unequivocally demonstrates all the facts alleged in the Commission's Complaint, leaving no dispute as to any element of the law. In addition to the summary judgment, and in accordance with the relief requested in the Commission's Complaint, the Commission will request that the Court enter an order: (1) permanently enjoining Defendants from future violations of the federal securities laws; (2) permanently barring Defendants from participating in an offering of penny stock; (3) ordering Defendants to disgorge their illegally-obtained gains (plus prejudgment interest thereon); and (4) ordering Defendants to pay a civil monetary penalty.

Respectfully submitted,

By:



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New York, New York  
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